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Via fax and Mail

Gwen Zervas
Case Manager
Bureau of Federal Case Management
Department of Environmental Protection
401 East State Street
P. O. Box 028
Trenton, New Jersey 08625

Re: Transmittal of EPA Comments for the *Work Plan for Task 3, Risk Assessment portion of the work plan entitled Delineating and Characterizing Elevated Lead Concentrations in Soil*, L. E. Carpenter, Wharton, New Jersey.

Dear Ms. Zervas:

As we discussed today, as a follow-up to the preliminary comments contained in my letter of October 26, 2000, on the Task 3, "Risk Assessment" portion of the above referenced document, the following are comments from the U. S. Environmental Protection Agency's Region 2 risk assessment staff.

1. The work plan correctly references the adult lead model as the appropriate tool by which to measure impacts to an adult worker population. As a note, the model and guidance documents can be found at:
<http://www.epa.gov/oerrpage/superfund/programs/lead/prods.htm>
2. It is stated that potential risk to adult workers will be characterized using "...site-specific parameters and total lead concentrations." The work plan should clearly identify which default parameters will be replaced with site-specific values (e.g., geometric standard deviation, blood lead concentration, intake rates for various media, exposure duration, etc.). In addition, the work plan should state how these site-specific data will be collected, and should verify that the databases for these site-specific values will be sufficient to allow for substitution into the model.
3. The work plan states that lead concentrations will be determined by a combination of XRF and laboratory analysis. Data which will be used in the adult lead model and the risk assessment should meet the appropriate QA/QC requirements.

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The sampling plan should be developed so that a statistically appropriate number of samples are collected and analyzed using the necessary analytical methods and validation procedures.

4. Since we are considering revising the remedy to leave lead laden soils on-site, rather than the ROD required excavation and off-site disposal, the risks and hazards associated with this option must also be addressed with respect to the Rockaway and its associated environment. As such, the work plan has been forwarded to the BTAG group for review and comment, if any.

In conclusion, thank you for the opportunity to review and provide comments on this document. Please feel free to contact me at (212) 637-4411, to discuss this matter further.

Yours truly,

Stephen Cipot, Remedial Project Manager
Southern New Jersey Remediation Section

cc: Carole Petersen, Chief
MaryAnne Rosa, Chief
Andy Crossland, PSB
Michael Sivak, PSB

bcc: Stephen Cipot, SNJRS